

ICH DRAFT:

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Active Pharmaceutical Ingredients**

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1 Introduction

1.1 Objective

This document (Guide) is intended to provide guidance regarding good manufacturing practice (GMP) for the manufacturing of active pharmaceutical ingredients (APIs) under an appropriate system for managing quality. It is also intended to ensure that all APIs meet requirements for quality and purity which they purport or are represented to possess.

In this Guide “manufacturing” is defined to include all operations of receipt of materials, production, packaging, repackaging, labelling, relabelling, quality control, release, storage and distribution of APIs and the related controls. In this Guide the term “should” indicates recommendations that are expected to apply unless shown to be inapplicable or replaced by an alternative demonstrated to provide at least an equivalent level of quality assurance. For the purposes of this Guide, the terms “current good manufacturing practices” and “good manufacturing practices” are equivalent.

The Guide as a whole does not cover safety aspects for the personnel engaged in the manufacture, nor aspects of protection of the environment. These controls are inherent responsibilities of the manufacturer and are governed by national laws.

This Guide is not intended to define registration/filing requirements or modify pharmacopeial requirements. This Guide does not affect the ability of the responsible regulatory agency to establish specific registration/filing requirements regarding APIs within the context of marketing/manufacturing authorizations or drug applications. All commitments in registration/filing documents must be met.

1.2 Regulatory Applicability

Within the world community, materials may vary as to the legal classification as an API. When a material is classified as an API in the region or country in which it is manufactured or used in a drug product, it should be produced according to this Guide.

1.3 Scope

This Guide applies to the manufacture of APIs for use in human drug (medicinal) products including sterile APIs only up to the point immediately prior to the API being rendered sterile. The sterilization and aseptic processing of sterile APIs are not covered by this guidance, but should be performed in accordance with GMP guidelines for drug (medicinal) products as defined by local authorities.

This Guide covers APIs that are manufactured by chemical synthesis, extraction, cell culture/fermentation, or by recovery from natural sources, or any combination of these processes. Specific guidance for APIs manufactured by cell culture/fermentation is described in Section 18. The intermediates and APIs produced by recombinant DNA technology will be included for the purpose of this Guide provided they are proteinacious materials.

This Guide excludes all vaccines, whole cells, whole blood and plasma, and APIs derived from them (plasma fractionation). However, it does include APIs that are produced using blood or plasma as raw materials. Note that cell substrates (mammalian, plant, or microbial cells, tissue or animal sources including transgenic animals) and early process steps may be subject to GMP but are not covered by this Guide. In addition, the Guide does not apply to medical gases, bulk-packaged drug (medicinal) products, and manufacturing/control aspects specific to radiopharmaceuticals.

Section 19 contains guidance that only applies to the manufacture of APIs used in the production of drug (medicinal) products specifically for clinical trials (investigational medicinal products).

An "API Starting Material" is a material used in the production of an API which is incorporated as a significant structural fragment into the structure of the API. An API Starting Material may be an article of commerce, a material purchased from one or more suppliers under contract or commercial agreement, or it may be produced in-house. API Starting Materials normally have defined chemical properties and structure.

The company should designate and document the rationale for the point at which production of the API begins. For synthetic processes this is known as the point at which "API Starting Materials" are entered into the process. For other processes (e.g. fermentation, extraction, purification, etc), this rationale should be established on a case by case basis.

From this point on appropriate GMP as defined in this Guide should be applied to these intermediate and/or API manufacturing steps. This would include the validation of critical process steps determined to impact the quality of the API. However it should be noted that the fact that a company chooses to validate a process step does not necessarily define that step as critical.

The guidance in this document would normally be applied to the steps shown in gray in the table on the next page. The table is an example; it does not imply that all steps shown must be completed. The stringency of GMP in API manufacturing should increase as the process proceeds from early API steps to final steps, purification, and packaging. Physical processing of APIs such as granulation, coating or physical manipulation of particle size (e.g. milling, micronizing) should be conducted at least to the standards of this Guide.

This GMP Guide does not apply to steps prior to the introduction of the defined "API Starting Material".

Type of Manufacturing	Application of this Guide to steps used in this type of manufacturing				
Chemical Manufacturing	Production of the API Starting Material	Introduction of the API Starting Material into process	Production of Intermediate(s)	Isolation and purification	Physical processing, and packaging
API extracted from plant sources	Collection of plant	Cutting and initial extraction(s)	Introduction of the API Starting Material into process	Isolation and purification	Physical processing, and packaging
API derived from animal sources	Collection of organ, fluid, or tissue	Cutting, mixing, and/or initial processing	Introduction of the API Starting Material into process	Isolation and purification	Physical processing, and packaging
Biotech/ fermentation cell culture	Establishment of master cell bank and working cell bank	Maintenance of working cell bank	Cell culture and/or fermentation	Isolation and purification	Physical processing, and packaging
“Classical” Fermentation to produce an API	Establishment of cell bank	Maintenance of the cell bank	Introduction of the cells into fermentation	Isolation and purification	Physical processing, and packaging
API consisting of comminuted or powdered herbs	Collection of plants and/or cultivation and harvesting	Cutting/ comminuting			Physical processing, and packaging
Herbal extracts used as API	Collection of plants	Cutting and initial extraction		Further extraction	Physical processing, and packaging



104 **2 Quality Management**

105 **2.1 Principles**

108 2.10 Quality should be the responsibility of all persons involved in manufacturing.

110 2.11 Each manufacturer should establish, document, and implement an effective system for
111 managing quality that involves the active participation of management and appropriate
112 manufacturing personnel.

114 2.12 The system for managing quality should encompass the organisational structure,
115 procedures, processes and resources, as well as activities necessary to ensure
116 confidence that the API will meet its intended specifications for quality and purity. All
117 quality related activities should be defined and documented.

119 2.13 All quality related activities should be recorded at the time they are performed.

121 2.14 Any deviation from established procedures should be documented and explained.
122 Critical deviations should be investigated, and the investigation and its conclusions
123 should be documented.

125 2.15 Procedures should exist for notifying responsible management in a timely manner of
126 regulatory inspections, serious GMP deficiencies, product defects and related actions
127 (e.g. quality related complaints, recalls, regulatory actions, etc.).

129 2.16 There should be a quality unit(s) which is independent of production, and which fulfills
130 both quality assurance (*QA*) and quality control (*QC*) responsibilities. This may be in
131 the form of separate QA and QC units or a single individual (or group), depending
132 upon the size and structure of the organization.

134 2.17 No materials should be released or used before the satisfactory completion of
135 evaluation by the quality unit(s) unless there are appropriate systems in place to allow
136 for such use (e.g. release under quarantine as described in Section 10.20 or the use of
137 raw materials or intermediates pending completion of evaluation).

139 2.18 The persons authorised to release intermediates and APIs should be specified.

142 **2.2 Responsibilities of the Quality Unit(s)**

144 2.20 The quality unit(s) should be involved in all quality-related matters.

146 2.21 The quality unit(s) should review and approve all appropriate quality related
147 documents.

149 11.50 The main responsibilities of the independent quality unit(s) / should not be delegated.
150 These responsibilities should be described in writing, and should include but not
151 necessarily be limited to:

153 1. Releasing or rejecting all APIs;

154

2. Establishing a system to release or reject raw materials, intermediates, packaging and labelling materials;
3. Reviewing completed manufacturing records for critical process steps before release of the API for distribution;
4. Making sure that critical deviations are investigated and resolved;
5. Approving all specifications and master production instructions;
6. Approving all procedures potentially impacting the quality of intermediates or APIs;
7. Making sure that internal audits (self-inspections) are performed;
8. Approving intermediate and API contract manufacturers;
9. Approving changes that potentially impact intermediate or API quality;
10. Reviewing and approving validation protocols and reports;
11. Making sure that quality related complaints are investigated and resolved;
12. Making sure that effective systems are used for maintaining and calibrating critical equipment;
13. Making sure that materials are appropriately tested and the results are reported;
14. Making sure that there is stability data to support retest or expiry dates and storage conditions on intermediates and/or APIs where appropriate; and
15. Performing product quality reviews (as defined in Section 2.5)

2.3 Responsibility for production activities

The responsibility for production activities should be described in writing, and should include but not necessarily be limited to:

1. Preparing, reviewing, approving and distributing the instructions for the production of intermediates or APIs according to written procedures;
2. Producing APIs and, when appropriate, intermediates according to pre-approved instructions;
3. Reviewing all production batch records and ensuring that these are completed and signed;
4. Making sure that all production deviations are reported and evaluated and that critical deviations are investigated and the conclusions are recorded;

5. Making sure that production facilities are clean and when necessary disinfected;
6. Making sure that the necessary calibrations are performed and records kept;
7. Making sure that the premises and equipment are maintained and records kept;
8. Making sure that validation plans, protocols and reports are reviewed and approved;
9. Evaluating proposed changes in product, process or equipment; and
10. Making sure that new and, when appropriate, modified facilities and equipment are qualified.

2.4 Internal Audits (Self Inspection)

- 2.40 In order to verify compliance with the principles of GMP for APIs, regular internal audits should be performed in accordance with an approved schedule.
- 2.41 Audit findings and corrective actions should be documented and brought to the attention of responsible management of the firm. Agreed corrective actions should be completed in a timely and effective manner.

2.5 Product Quality Review

- 2.50 Regular quality reviews of APIs should be conducted with the objective of verifying the consistency of the process. Such reviews should normally be conducted and documented annually and should include at least:
- A review of critical in-process control and critical API test results;
 - A review of all batches which failed to meet established specifications;
 - A review of all critical deviations or non-conformances and related investigations;
 - A review of any changes carried out to the processes or analytical methods;
 - A review of results of the stability monitoring program;
 - A review of all quality related returns, complaints and recalls; and
 - A review of adequacy of corrective actions.
- 2.51 The results of this review should be evaluated and an assessment made of whether corrective action or any revalidation is necessary. The necessity for such corrective action should be documented. Agreed corrective actions should be completed in a timely and effective manner.

3 Personnel

3.1 Personnel Qualifications

255 3.10 There should be an adequate number of personnel qualified by appropriate education,
256 training and/or experience to perform and supervise the manufacture of intermediates
257 and APIs.
258

259 3.11 The responsibilities of all personnel engaged in the manufacture of intermediates and
260 APIs should be specified in writing.
261

262 3.12 Training should be regularly conducted by qualified individuals and should cover at a
263 minimum the particular operations that the employee performs and GMP as it relates
264 to the employee's functions. Records of training should be maintained. The practical
265 effectiveness of the training should be periodically assessed.
266

267 **3.2 Personnel Hygiene**

268
269
270 3.20 Personnel should practice good sanitation and health habits.
271

272 3.21 Personnel should wear clean clothing suitable for the manufacturing activity with
273 which they are involved and this clothing should be changed when necessary.
274 Additional protective apparel, such as head, face, hand, and arm coverings, should be
275 worn when necessary, to protect intermediates and APIs from contamination.
276

277 3.22 Personnel should avoid direct contact with intermediates or APIs.
278

279 3.23 Smoking, eating, drinking, chewing and the storage of food should be restricted to
280 certain designated areas separate from the manufacturing areas.
281

282 3.24 Personnel suffering from an infectious disease or having open lesions on the exposed
283 surface of the body should not engage in activities, that could result in compromising
284 the quality of APIs. Any person shown at any time (either by medical examination or
285 supervisory observation) to have an apparent illness or open lesions that may
286 adversely affect the safety or quality of APIs should be excluded from direct contact
287 with APIs until the condition is corrected or qualified medical personnel determine that
288 the person's inclusion would not jeopardize the safety or quality of the APIs.
289
290
291

292 **3.3 Consultants**

293
294 3.30 Consultants advising on the manufacture and control of intermediates or APIs should
295 have sufficient education, training, and experience, or any combination thereof, to
296 advise on the subject for which they are retained.
297

298 3.31 Records should be maintained stating the name, address, qualifications, and type of
299 service provided by these consultants.
300
301

302 **4 Buildings and Facilities**

303 **4.1 Design and Construction**

304
305

- 306 4.10 Buildings and facilities used in the manufacture of intermediates and APIs should be
307 located, designed, and constructed to facilitate cleaning, maintenance, and operations
308 as appropriate to the type and stage of manufacture. Facilities should also be
309 designed to minimize potential contamination. Where microbiological specifications
310 have been established for the intermediate or API, facilities should also be designed to
311 limit exposure to objectionable microbiological contaminants as appropriate.
312
- 313 4.11 Buildings and facilities should have adequate space for the orderly placement of
314 equipment and materials to prevent mix-ups and contamination.
315
- 316 4.12 Where the equipment itself (e.g., closed or contained systems) provides adequate
317 protection of the material, such equipment may be located outdoors.
318
- 319 4.13 The flow of materials and personnel through the building or facilities should be
320 designed to prevent mix-ups or contamination.
321
- 322 4.14 There should be defined areas or other control systems for the following activities:
323 - Receipt, identification, sampling, and quarantine of incoming materials, pending
324 release or rejection;
325 - Quarantine before release or rejection of intermediates and APIs;
326 - Sampling of intermediates and APIs;
327 - Holding rejected materials before further disposition (e.g., return, reprocessing or
328 destruction);
329 - Storage of released materials;
330 - Production operations;
331 - Packaging and labelling operations; and
332 - Control and laboratory operations.
333
- 334 4.15 Adequate and clean washing facilities should be provided for personnel. These
335 washing facilities should be equipped with hot and cold water as necessary, soap or
336 detergent, air driers or single service towels. The washing and toilet facilities should
337 be separate from, but easily accessible to, manufacturing areas. Adequate facilities
338 for showering and/or changing clothes should be provided when appropriate.
339
- 340 4.16 Laboratory areas/operations should normally be separated from production areas.
341 Some laboratory areas, in particular those used for in-process controls, may be located
342 in production areas, provided the operations of the production process do not adversely
343 affect the accuracy of the laboratory measurements, and the laboratory and its
344 operations do not adversely affect the production process or intermediate or API.
345
346
- 347 **4.2 Utilities**
348
- 349 4.20 All utilities that could impact on product quality (e.g. steam, gases, and compressed
350 air) should be qualified and appropriately monitored to ensure that specifications are
351 met and action is taken when limits are exceeded.
352
- 353 4.21 Adequate ventilation and exhaust systems should be provided, where necessary.
354 These systems should be designed and constructed to minimise risks of contamination
355 and cross-contamination and should include equipment for control of air pressure,
356 microorganisms (if appropriate), dust, humidity, and temperature, as appropriate to the

- 357 stage of manufacture. Particular attention should be given to areas where APIs are
358 exposed to the environment.
359
- 360 4.22 If air is recirculated to production areas, appropriate measures should be taken to
361 control risks of contamination and cross-contamination.
362
- 363 4.23 Permanently installed pipework should be appropriately identified. This can be
364 accomplished by identifying individual lines, documentation, computer control systems,
365 or alternative means. Pipework should be located to avoid risks of contamination of
366 the intermediate or API.
367
- 368 4.24 Drains should be of adequate size and should be provided with an air break or a
369 suitable device to prevent back-siphonage, when appropriate.
370
371
- 372 **4.3 Water**
373
- 374 4.30 Water used in the manufacture of APIs should be demonstrated to be suitable for its
375 intended use.
376
- 377 4.31 Unless otherwise justified, process water should, at a minimum, meet national
378 standards for potable water that have been documented as at least equivalent to
379 World Health Organization (WHO) guidelines. In the absence of national standards,
380 WHO guidelines should be used.
381
- 382 4.32 If potable water standards are insufficient to assure API quality and tighter chemical
383 and microbiological water quality specifications are necessary, appropriate
384 specifications for physical/chemical attributes, total microbial counts, objectionable
385 organisms and/or endotoxins should be established.
386
- 387 4.33 Where water used in the process is treated by the manufacturer to achieve defined
388 quality, the treatment process should be validated and monitored with appropriate
389 action limits.
390
- 391 4.34 Where the manufacturer of a non-sterile API either intends or claims that it is suitable
392 to be used in further processing to produce a sterile drug (medicinal) product, then
393 water used in the final isolation and purification steps should be monitored and
394 controlled for total microbial counts, objectionable organisms, and endotoxins.
395
396
- 397 **4.4 Containment**
398
- 399 4.40 Dedicated production areas, which may include such facilities as air handling
400 equipment and/or process equipment, should be employed in the production of each
401 type of highly sensitizing material (e.g., penicillins or cephalosporins).
402
- 403 4.41 Dedicated production areas should also be considered when material of an infectious
404 nature or high pharmacological activity or toxicity is involved (e.g., certain steroids or
405 cytotoxic anti-cancer agents) unless validated inactivation and/or cleaning procedures
406 are established and maintained.
407

- 408 4.42 Appropriate measures should be established and implemented to prevent cross-
409 contamination from personnel, materials, etc. moving from one dedicated area to
410 another.
411
- 412 4.43 Any production activities (including weighing, milling, or packaging) of highly toxic
413 non-pharmaceutical materials such as herbicides and pesticides should not be
414 conducted using the buildings and/or equipment being used for the production of APIs.
415 Handling and storage of these highly toxic non-pharmaceutical materials should be
416 separate from APIs.
417
418
- 419 **4.5 Lighting**
420
- 421 4.50 Adequate lighting should be provided in all areas to facilitate cleaning, maintenance,
422 and proper operations.
423
424
- 425 **4.6 Sewage and Refuse**
426
- 427 4.60 Sewage, refuse, and other waste (e.g., solids, liquids, or gaseous by-products from
428 manufacturing) in and from buildings and the immediate surrounding area should be
429 disposed of in a safe, timely, and sanitary manner. Containers and/or pipes for waste
430 material should be clearly identified.
431
432
- 433 **4.7 Sanitation and Maintenance**
434
- 435 4.70 Buildings used in the manufacture of intermediates and APIs should be properly
436 maintained and repaired and kept in a clean condition.
437
- 438 4.71 Written procedures should be established assigning responsibility for sanitation and
439 describing the cleaning schedules, methods, equipment, and materials to be used in
440 cleaning buildings and facilities.
441
- 442 4.72 When necessary, written procedures should also be established for the use of suitable
443 rodenticides, insecticides, fungicides, fumigating agents, and cleaning and sanitizing
444 agents to prevent the contamination of equipment, raw materials, packaging/labelling
445 materials, intermediates, and APIs.
446
447
- 448 **5 Process Equipment**
449
- 450 **5.1 Design and Construction**
451
- 452 5.10 Equipment used in the manufacture of intermediates and APIs should be of
453 appropriate design and adequate size, and suitably located for its intended use,
454 cleaning, sanitization (where appropriate), and maintenance.
455
- 456 5.11 Equipment should be constructed so that surfaces that contact raw materials,
457 intermediates, or APIs do not alter the quality of the intermediates and APIs beyond
458 the official or other established specifications.

- 459
- 460 5.12 Production equipment should only be used within its qualified operating range.
- 461
- 462 5.13 Major equipment (e.g., reactors, storage containers) and permanently installed
- 463 processing lines used during the production of an intermediate or API should be
- 464 appropriately identified.
- 465
- 466 5.14 Any substances necessary for the operation of equipment, such as lubricants, heating
- 467 fluids or coolants, should not contact intermediates or APIs so as to alter their quality
- 468 beyond the official or other established specifications. Any deviations from this should
- 469 be evaluated to ensure that there are no detrimental effects upon the fitness for
- 470 purpose of the material. Wherever possible food grade lubricants and oils should be
- 471 used.
- 472
- 473 5.15 Closed or contained equipment should be used whenever appropriate. Where open
- 474 equipment is used, or equipment is opened, appropriate precautions should be taken to
- 475 minimize contamination.
- 476
- 477 5.16 A set of current drawings should be maintained for equipment and critical installations
- 478 (e.g., instrumentation and utility systems).
- 479

480

481 **5.2 Equipment Maintenance and Cleaning**

482

- 483 5.20 Schedules and procedures (including assignment of responsibility) should be
- 484 established for the preventative maintenance of equipment.
- 485
- 486 5.21 Written procedures should be established for cleaning of equipment and its subsequent
- 487 release for use in the manufacture of intermediates and APIs. Cleaning procedures
- 488 should contain sufficient details to enable operators to clean each type of equipment
- 489 in a reproducible and effective manner. These procedures should include, but should
- 490 not be limited to:
- 491 - Assignment of responsibility for cleaning of equipment;
- 492 - Cleaning schedules, including, where appropriate, sanitizing schedules;
- 493 - A complete description of the methods and materials, including dilution of cleaning
- 494 agents used to clean equipment;
- 495 - When appropriate, instructions for disassembling and reassembling each article of
- 496 equipment to ensure proper cleaning;
- 497 - Instructions for the removal or obliteration of previous batch identification;
- 498 - Instructions for the protection of clean equipment from contamination prior to use;
- 499 - Inspection of equipment for cleanliness immediately before use, if practical; and
- 500 - Establishing the maximum time that may elapse between the completion of
- 501 processing and equipment cleaning, when appropriate.
- 502
- 503
- 504 5.22 Equipment and utensils should be cleaned, stored, and, where necessary, sanitized or
- 505 sterilized to prevent contamination or carry-over of a material that would alter the
- 506 quality of the intermediate or API beyond the official or other established
- 507 specifications.
- 508

- 509 5.23 Where equipment is assigned to continuous production or campaign production of
510 successive batches of the same intermediate or API, equipment should be cleaned at
511 appropriate intervals to prevent build-up and carry-over of contaminants (e.g.
512 degradants) or objectionable levels of micro-organisms.
513
- 514 5.24 Non-dedicated equipment should be cleaned between production of different
515 materials to prevent cross-contamination.
516
- 517 5.25 Acceptance criteria for residues and the choice of cleaning procedures and cleaning
518 agents should be defined and justified.
519
- 520 5.26 Equipment should be identified as to its contents and its cleanliness status by
521 appropriate means.
522
523
- 524 **5.3 Calibration**
525
- 526 5.30 Control, weighing, measuring, monitoring and test equipment that is critical for assuring
527 the quality of intermediates or APIs should be calibrated according to written
528 procedures and an established schedule.
529
- 530 5.31 Equipment calibrations should be performed using standards traceable to certified
531 standards, if existing.
532
- 533 5.32 Records of these calibrations should be maintained.
534
- 535 5.33 The current calibration status of critical equipment should be known and verifiable.
536
- 537 5.34 Instruments that do not meet calibration criteria should not be used.
538
- 539 5.35 Deviations from approved standards of calibration on critical instruments should be
540 investigated to determine if these could have had an impact on the quality of the
541 intermediate(s) or API(s) manufactured using this equipment since the last successful
542 calibration.
543
544
- 545 **5.4 Computerized Systems**
546
- 547 5.40 GMP related computerized systems should be validated. The depth and scope of
548 validation depends on the diversity, complexity and criticality of the computerized
549 application.
550
- 551 5.41 Appropriate installation qualification and operational qualification should demonstrate
552 the suitability of computer hardware and software to perform assigned tasks.
553
- 554 5.42 Commercially available software that has been qualified does not require the same
555 level of testing. If an existing system was not validated at time of installation, a
556 retrospective validation may be conducted if appropriate documentation is available.
557
- 558 5.43 Computerized systems should have sufficient controls to prevent unauthorized access
559 or changes to data. There should be controls to prevent omissions in data (e.g. system

- 560 turned off and data not captured). There should be a record of any data change made,
561 the previous entry, who made the change, and when the change was made.
562
- 563 5.44 Written procedures should be available for the operation and maintenance of
564 computerized systems.
565
- 566 5.45 Where critical data are being entered manually, there should be an additional check on
567 the accuracy of the entry. This may be done by a second operator or by the system
568 itself.
569
- 570 5.46 Incidents related to computerized systems that could affect the quality of
571 intermediates or APIs or the reliability of records or test results should be recorded
572 and investigated.
573
- 574 5.47 All changes to the computerized system should be made according to a change
575 procedure and should be formally authorized, documented and tested. Records should
576 be kept of all changes including modifications and enhancements made to the
577 hardware, software and any other critical component of the system to demonstrate
578 that the final system is maintained in a validated state.
579
- 580 5.48 If system breakdowns or failures would result in the permanent loss of records then a
581 back-up system should be provided. A means of ensuring data protection should be
582 established for all computerized systems.
583
- 584 5.49 Recording data by a second means in addition to the computer system is acceptable to
585 provide a backup data source.
586
587
588
- 589 **6 Documentation and Records**
590
- 591 **6.1 Documentation System and Specifications**
592
- 593 6.10 All documents related to the manufacture of intermediates or APIs should be
594 prepared, reviewed, approved and distributed according to written procedures. Such
595 documents may be in paper or electronic form.
596
- 597 6.11 The issuance, revision, superseding and withdrawal of all documents should be
598 controlled with maintenance of revision histories.
599
- 600 6.12 A procedure should be established for retaining all appropriate documents (e.g.,
601 development history reports, scale-up reports, technical transfer reports, process
602 validation reports, training records, production records, control records, and distribution
603 records). The retention periods for these documents should be specified.
604
- 605 6.13 All production, control, and distribution records should be retained for at least one year
606 after the expiry date of the batch. For APIs with retest dates, records should be
607 retained for at least three years after the batch is completely distributed.
608
- 609 6.14 When entries need to be made in records, these should be made indelibly in spaces
610 provided for such entries, directly after performing the activities (in the order

performed), and should identify the person making the entry. Corrections to entries should be dated and signed and leave the original entry still readable.

6.15 All records or copies of such records, should be readily available during the retention period at the establishment where the activities described in such records occurred. Records that can be promptly retrieved from another location by electronic or other means are acceptable.

6.16 Specifications, instructions, procedures, and records may be retained either as originals or as true copies such as photocopies, microfilm, microfiche, or other accurate reproductions of the original records. Where reduction techniques such as microfilming or electronic records are used, suitable retrieval equipment and a means to produce a hard copy should be readily available.

6.17 Specifications should be established and documented for raw materials, intermediates where necessary, APIs and labelling and packaging materials. In addition, specifications may be necessary for certain other materials, such as process aids, gaskets, or other materials used during the production of intermediates or APIs that would critically impact on quality. Acceptance criteria should be established and documented for in-process controls.

6.18 Electronic signatures on documents are acceptable, provided they are authenticated and secure.

6.2 Equipment Cleaning and Use Record

6.20 Records of major equipment use, cleaning, sanitization and/or sterilization and maintenance should show the date, time (if appropriate), product, and batch number of each batch processed in the equipment, and the person who performed the cleaning and maintenance.

6.21 If equipment is dedicated to manufacturing one intermediate or API, then individual equipment records are not necessary if batches of the intermediate or API follow in traceable sequence. In cases where dedicated equipment is employed, the records of cleaning, maintenance, and use may be part of the batch record or may be maintained separately.

6.3 Records of Raw Materials, Intermediates, API Labelling and Packaging Materials

6.30 Records should be maintained including:

- The name of the manufacturer, identity and quantity of each shipment of each batch of raw materials, intermediates or labelling and packaging materials for APIs; the name of the supplier; the supplier's control number(s), if known, or other identification number; the number allocated on receipt; and the date of receipt; -
- The results of any test or examination performed and the conclusions derived from this;

- 662 - Records tracing the use of materials;
- 663 - Documentation of the examination and review of API labelling and packaging
- 664 materials for conformity with established specifications; and
- 665 - The final decision regarding rejected raw materials, intermediates or API labelling
- 666 and packaging materials.

667

668 6.31 Master (approved) labels should be maintained for comparison to issued labels.

669

670 **6.4 Master Production Instructions (Master Production and Control Records)**

671

672 6.40 To ensure uniformity from batch to batch, master production instructions for each

673 intermediate and API should be prepared, dated, and signed by one person and

674 independently checked, dated, and signed by a person in the quality unit(s).

675

676 6.41 Master production instructions should include:

- 677 - The name of the intermediate or API being manufactured and an identifying
- 678 document reference code, if applicable;
- 679 - A complete list of raw materials and intermediates designated by names or codes
- 680 sufficiently specific to identify any special quality characteristics;
- 681 - An accurate statement of the quantity or ratio of each raw material or intermediate
- 682 to be used, including the unit of measure. Where the quantity is not fixed, the
- 683 calculation for each batch size or rate of production should be included.
- 684 Reasonable variations are permitted provided they are justified;
- 685 - The production location and major production equipment to be used;
- 686 - Detailed production instructions, including the:
 - 687 - sequences to be followed,
 - 688 - ranges of process parameters to be used,
 - 689 - sampling instructions and in-process controls with their acceptance criteria,
 - 690 where appropriate,
 - 691 - time limits for completion of individual processing steps and/or the total
 - 692 process, where appropriate; and
 - 693 - expected yield ranges at appropriate phases of processing or time;
- 694 - Where appropriate, special notations and precautions to be followed, or cross-
- 695 references to these; and
- 696 - The instructions for storage of the intermediate or API to assure its suitability for
- 697 use, including the labelling and packaging materials and special storage conditions
- 698 with time limits where appropriate.
- 699

700

701 **6.5 Batch Production Records (Batch Production and Control Records)**

702

703 6.50 Batch production records should be prepared for each intermediate and API and

704 should include complete information relating to the production and control of each

705 batch. The batch production record should be checked before issuance to assure that

706 it is the correct version and a legible accurate reproduction of the appropriate master

707 production instruction. If the batch production record is produced from a separate

master document, that document must include a reference to the current master production instruction being used.

6.51 These records should be numbered with a unique batch or identification number, dated and signed when issued. In continuous production the product code together with the date and time may serve as the unique identifier until the final number is allocated.

6.52 Written procedures should be established and followed for investigating critical deviations or the failure of a batch of intermediate or API to meet specifications. The investigation should extend to other batches that may have been associated with the specific failure or deviation.

6.53 Intermediates and APIs failing to meet established specifications should be identified as such and quarantined. Written procedures should be followed if these materials are reprocessed or reworked. The final disposition of rejected materials should be recorded.

6.54 Documentation of completion of each significant step in the batch production records (batch production and control records) should include:

- Dates and, when appropriate, times;
- Identity of major equipment (e.g., reactors, driers, mills, etc.) used;
- Specific identification of each batch, including weights, measures, and batch numbers of raw materials, intermediates, or any reprocessed materials used during manufacturing;
- Actual results recorded for critical process parameters;
- Any sampling performed;
- Signatures of the persons performing and directly supervising or checking each critical step in the operation;
- In-process and laboratory test results;
- Actual yield at appropriate phases or times;
- Description of packaging and label for intermediate or API;
- Representative label of API or intermediate if made commercially available;
- Any deviation noted, its evaluation, investigation conducted (if appropriate) or reference to that investigation if stored separately; and
- Results of release testing.

6.6 Laboratory Control Records

6.60 Laboratory control records should include complete data derived from all tests necessary to ensure compliance with established specifications and standards, including examinations and assays, as follows:

- A description of samples received for testing, including the material name or source, batch number or other distinctive code, date sample was taken, and, where appropriate, the quantity and date the sample was received for testing;
- A statement of or reference to each test method used;
- A statement of the weight or measure of sample used for each test as described by the method; data on or cross-reference to the preparation and testing of laboratory reference standards, reagents and standard solutions,
- A complete record of all raw data secured during each test, in addition to graphs, charts, and spectra from laboratory instrumentation, properly identified to show the specific material and batch tested;
- A record of all calculations performed in connection with the test, including, for example, units of measure, conversion factors, and equivalency factors;
- A statement of the test results and how they compare with established specifications;
- The signature of the person who performed each test and the date(s) the tests were performed; and
- The date and signature of a second person showing that the original records have been reviewed for accuracy, completeness, and compliance with established standards.

771

772 6.61 Complete records should also be maintained for:

- Any modifications to an established analytical method,
- Periodic calibration of laboratory instruments, apparatus, gauges, and recording devices;
- All stability testing performed on APIs; and
- Out-of-specification (OOS) investigations.

778

779

780 **6.7 Batch Production Record Review**

781

782 6.70 Written procedures should be established and followed for the review and approval of
783 batch production and laboratory control records, including packaging and labelling, to
784 determine compliance of the intermediate or API with established specifications
785 before a batch is released or distributed.

786

787 6.71 Batch production and laboratory control records for critical process steps
788 should be reviewed and approved by the quality unit(s) before an API batch is
789 released or distributed. Production and laboratory control records for earlier, non-
790 critical process steps may be reviewed by qualified production personnel or other units
791 following procedures approved by the quality unit(s).

792

793 6.72 All deviation, investigation, and OOS reports should be reviewed as part of the batch
794 record review before the batch is released.

795

796 6.73 The quality unit(s) may delegate to the production unit the responsibility and authority
797 for release of intermediates.
798
799

800 **7 Materials Management**

801 **7.1 General Controls**

802 7.10 There should be written procedures describing the receipt, identification, quarantine,
803 storage, handling, sampling, testing, and approval or rejection of materials.
804
805
806

807 7.11 Manufacturers of intermediates and/or APIs should have a system for evaluating the
808 suppliers of critical materials.
809

810 7.12 Materials should be purchased against an agreed specification, from a supplier or
811 suppliers approved by the quality unit(s).
812

813 7.13 If the supplier of a critical material is not the manufacturer of that material, the name
814 and address of that manufacturer should be known by the intermediate and/or API
815 manufacturer.
816

817 7.14 Changing the source of supply of critical raw materials should be treated according to
818 Section 13, Change Control.
819
820

821 **7.2 Receipt and Quarantine**

822
823 7.20 Upon receipt and before acceptance, each container or grouping of containers of
824 materials should be examined visually for correct labelling, container damage, broken
825 seals and evidence of tampering or contamination. Materials should be held under
826 quarantine until they have been sampled, examined or tested as appropriate, and
827 released for use.
828

829 7.21 Before incoming materials are mixed with existing stocks (e.g., solvents or stocks in
830 silos) they should be identified as correct and released. Procedures should be
831 available to prevent discharging into the wrong stock.
832

833 7.22 If bulk deliveries are made in non-dedicated tankers, there should be assurance of no
834 cross-contamination from the tanker. Means of providing this assurance could include
835 one or more of the following:

- 836 - certificate of cleaning
- 837 - testing for trace impurities
- 838 - audit of the supplier.
839

840 7.23 Large storage containers, and their attendant manifolds, filling and discharge lines
841 should be appropriately identified.
842

843 7.24 Each container or grouping of containers (batches) of materials should be assigned
844 and identified with a distinctive code, batch, or receipt number. This number should be
845 used in recording the disposition of each batch. A system should be in place to
846 identify the status of each batch.

847

848

849 7.3 Sampling and Testing of Materials

850

851 7.30 At least one test to verify the identity of each batch of material should be conducted,
852 with the exception of the materials described below in 7.32. A supplier's Certificate
853 of Analysis may be used in place of performing other tests provided that the
854 manufacturer has a system in place to evaluate suppliers.

855

856 7.31 Supplier approval should require an evaluation including adequate evidence (e.g., past
857 quality history) that the supplier can consistently provide material meeting
858 specifications. Full analyses should be conducted on at least three batches before
859 reducing in-house testing. However, as a minimum, a full analysis should be
860 performed at appropriate intervals and compared with the Certificates of Analysis.
861 Reliability of Certificates of Analysis should be checked at regular intervals.

862

863 7.32 Processing aids, hazardous or highly toxic raw materials, and other special materials
864 do not need to be tested, provided the manufacturer's Certificate of Analysis is
865 obtained showing that these raw materials conform to established specifications.
866 Visual examination of containers, labels, and recording of batch numbers should help
867 in establishing the identity of these materials. The lack of on-site testing for these
868 materials should be justified and documented.

869

870 7.33 Samples should be representative of the batch of material from which they are taken.
871 Sampling methods should specify the number of containers to be sampled, which part
872 of the container to sample, and the amount of material to be taken from each
873 container. The number of containers to sample and the sample size should be based
874 upon a sampling plan which takes into consideration criticality of the material, material
875 variability, past quality history of the supplier, and the quantity needed for analysis.

876

877 7.34 Sampling should be conducted at defined locations and by procedures designed to
878 prevent contamination of the material sampled and contamination of other materials.

879

880 7.35 Containers from which samples are withdrawn should be opened carefully and
881 subsequently reclosed. They should be marked to indicate that a sample has been
882 taken.

883

884

885 7.4 Storage

886

887 7.40 Materials should be handled and stored in a manner to prevent degradation,
888 contamination, and cross-contamination.

889

890 7.41 Materials stored in fiber drums, bags, or boxes should be stored off the floor and when
891 necessary, suitably spaced to permit cleaning and inspection.

892

893 7.42 Materials should be stored under conditions and for a period that have no adverse
894 affect on their quality, and should normally be rotated so that the oldest stock is used
895 first.

896

- 897 7.43 Certain materials in suitable containers may be stored outdoors, provided identifying
898 labels remain legible and containers are appropriately cleaned before opening and use.
899
- 900 7.44 Rejected materials should be identified and controlled under a quarantine system
901 designed to prevent their unauthorised use in manufacturing.
902
903
- 904 **7.5 Re-evaluation**
905
- 906 7.50 Materials should be re-evaluated as appropriate to determine their suitability for use
907 (e.g., after prolonged storage or exposure to heat or humidity).
908
909
910
- 911 **8 Production and In-Process Controls**
912
- 913 **8.1 Production Operations**
914
- 915 8.10 Raw materials for intermediate and API manufacturing should be weighed or
916 measured under appropriate conditions that do not affect their suitability for use.
917 Weighing and measuring devices should be of suitable accuracy for the intended use.
918
- 919 8.11 If a material is subdivided for later use in production operations, the container
920 receiving the material should be suitable and should be so identified that the following
921 information is available:
922 - Material name and item code;
923 - Receiving or control number;
924 - Weight or measure of material in the new container; and
925 - Re-evaluation or retest date if appropriate.
926
- 927 8.12 Critical weighing, measuring, or subdividing operations should be supervised or
928 subjected to an equivalent control. Prior to use, production personnel should verify
929 that the materials are those specified in the batch record for the intended intermediate
930 or API.
931
- 932 8.13 Other critical activities should be supervised or subjected to an equivalent control.
933
- 934 8.14 Actual yields should be compared with expected yields at designated steps in the
935 production process. Expected yields with appropriate ranges should be established
936 based on previous laboratory, pilot scale, or manufacturing data. Deviations in yield
937 associated with critical process steps should be investigated to determine their impact
938 or potential impact on the resulting quality of affected batches.
939
- 940 8.15 Any deviation should be documented and explained. Any critical deviation should be
941 investigated.
942
- 943 8.16 The processing status of major units of equipment should be indicated either on the
944 individual units of equipment or by appropriate documentation, computer control
945 systems, or alternative means.
946

- 947 8.17 Materials to be reprocessed or reworked should be appropriately controlled to prevent
948 unauthorized use.
949
950
- 951 **8.2 Time Limits**
952
- 953 8.20 If time limits are specified in the master production instruction (see 6.41), these time
954 limits should be met to ensure the quality of intermediates and APIs. Deviations should
955 be documented and evaluated. Time limits may be inappropriate when processing to a
956 specification (e.g., pH adjustment, hydrogenation, drying to predetermined
957 specification) because completion of reactions or processing steps are determined by
958 in-process sampling and testing.
959
- 960 8.21 Intermediates held for further processing should be stored under appropriate
961 conditions to assure their suitability for use.
962
963
- 964 **8.3 In-process Sampling and Controls**
965
- 966 8.30 Written procedures should be established to monitor the progress and control the
967 performance of processing steps that cause variability in the quality characteristics of
968 intermediates and APIs. In-process controls and their acceptance criteria should be
969 defined based on the information gained during the development stage or historical
970 data.
971
- 972 8.31 The acceptance criteria and type and extent of testing may depend on the nature of
973 the intermediate or API being manufactured, the reaction or process step being
974 conducted, and the degree to which the process introduces variability in the product's
975 quality. Less stringent in-process controls may be appropriate in early processing
976 steps, whereas tighter controls may be appropriate for later processing steps (e.g.,
977 isolation and purification steps).
978
- 979 8.32 Critical in-process controls (and process monitoring), including the control points and
980 methods, should be stated in writing and approved by the quality unit(s).
981
- 982 8.33 In-process controls may be performed by production department personnel and the
983 process adjusted without prior quality unit(s) approval, provided adjustments are made
984 within pre-established limits approved by the quality unit(s). All tests and results
985 should be fully documented as part of the batch record.
986
- 987 8.34 Written procedures should describe the sampling methods for in-process materials,
988 intermediates, and APIs. Sampling plans and procedures should be based on
989 scientifically sound sampling practices.
990
- 991 8.35 In-process sampling should be conducted using procedures designed to prevent
992 contamination of the sampled material and other intermediates or APIs. Procedures
993 should be established to ensure the integrity of samples after collection.
994
995
996
- 997 **8.4 Blending Batches of Intermediates or APIs**

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11.50 For the purpose of this document, blending is defined as the process of combining materials within the same specification to produce a homogeneous intermediate or API. In-process mixing of fractions from single batches (e.g., collecting multiple fermentation batches in a single holding tank or collecting several centrifuge loads from a single crystallization batch) is considered to be part of the production process and is not considered to be blending.

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8.41 Out-Of-Specification batches should not be blended with other batches for the purpose of meeting specifications. Each batch incorporated into the blend should have been manufactured using an established process and should have been individually tested and found to meet appropriate specifications prior to blending.

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8.42 Acceptable blending operations include but are not limited to:

- Blending of small batches to increase batch size
- Blending of tailings (i.e., relatively small quantities of isolated material) from batches of the same intermediate or API to form a single batch.

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8.43 Blending processes should be adequately controlled and documented and the blended batch should be tested for conformance to established specifications.

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8.45 Where physical attributes of the API are critical (e.g., APIs intended for use in solid oral dosage forms or suspensions) blending operations should be validated to show homogeneity of the combined batch. Validation should include testing of critical attributes (e.g., particle size distribution, bulk density, and tap density) that may be affected by the blending process.

1028

1029

1030

8.46 Stability testing of the final blended batches is necessary if the blending could cause a change in the already established stability data.

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1034

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8.47 The expiry or retest date of the blended batch should be based on the manufacturing date of the oldest tailings or batch in the blend.

1036

1037

8.5 Contamination Control

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8.50 Carryover of leftover materials from successive batches of the same intermediate or API (e.g., residue adhering to the wall of a micronizer, residual layer of damp crystals remaining in a centrifuge bowl after discharge, and incomplete discharge of fluids or crystals from a processing vessel upon transfer of the material to the next step in the process) is acceptable provided it is adequately controlled. Such carryover should not result in the carryover of degradants or microbial contamination that may adversely alter the established API impurity profile.

1046

1047

1048

8.51 Production operations should be conducted in a manner that will prevent contamination of intermediates or APIs by other materials.

- 1049 8.52 Special attention should be taken when APIs are handled after purification to avoid
1050 contamination.
1051
1052
1053
- 1054 **9 Packaging and Labelling of APIs and Intermediates for Transport**
1055
- 1056 **9.1 General**
1057
- 1058 9.10 There should be written procedures describing the receipt, identification, quarantine,
1059 sampling, examination and/or testing and release, and handling of packaging and
1060 labelling materials.
1061
- 1062 9.11 Packaging and labelling materials should conform to established specifications. Those
1063 that do not comply with such specifications should be rejected to prevent their use in
1064 operations for which they are unsuitable.
1065
- 1066 9.12 Records should be maintained for each shipment of labels and packaging materials
1067 showing receipt, examination, or testing, and whether accepted or rejected.
1068
1069
- 1070 **9.2 Packaging Materials**
1071
- 1072 9.20 Containers should provide adequate protection against deterioration or contamination
1073 of the intermediate or API that may occur during transportation and recommended
1074 storage.
1075
- 1076 9.21 Containers should be clean, and where indicated by the nature of the intermediate or
1077 API, sanitized to ensure that they are suitable for their intended use. These containers
1078 should not be reactive, additive, or absorptive so as to alter the quality of the
1079 intermediate or API beyond the specified limits.
1080
- 1081 9.22 If containers are re-used, they should be cleaned in accordance with documented
1082 procedures and all previous labels should be removed or defaced.
1083
1084
- 1085 **9.3 Label Issuance and Control**
1086
- 1087 9.30 Access to the label storage areas should be limited to authorised personnel.
1088
- 1089 9.31 Procedures should be used to reconcile the quantities of labels issued, used, and
1090 returned and to evaluate discrepancies found between the number of containers
1091 labelled and the number of labels issued. Such discrepancies should be investigated,
1092 and the investigation should be approved by the quality unit(s).
1093
- 1094 9.32 All excess labels bearing batch numbers or other batch related printing should be
1095 destroyed. Returned labels should be maintained and stored in a manner that prevents
1096 mix-ups and provides proper identification.
1097
- 1098 9.33 Obsolete and out-dated labels should be destroyed.
1099

- 1100 9.34 Printing devices used to print labels for packaging operations should be controlled to
1101 ensure that all imprinting conforms to the print specified in the batch production
1102 record.
1103
- 1104 9.35 Printed labels issued for a batch should be carefully examined for proper identity and
1105 conformity to specifications in the master production record. The results of this
1106 examination should be documented in the batch production record.
1107
- 1108 9.36 A printed label representative of those used should be included in the batch production
1109 record.
1110

1112 **9.4 Packaging and Labelling Operations**

1113

- 1114 9.40 There should be documented procedures designed to ensure that correct packaging
1115 materials and labels are used.
1116
- 1117 9.41 Labelling operations should be designed to prevent mix-ups. There should be physical
1118 or spatial separation from operations involving other intermediates or APIs.
1119
- 1120 9.42 Labels used on containers of intermediates or APIs should indicate the name or
1121 identifying code, the batch number of the product and storage conditions when such
1122 information is critical to assure the quality of intermediate or API. If the intermediate
1123 or API is intended to be transferred outside the control of the manufacturer's material
1124 management system, the name and address of the manufacturer, quantity of contents,
1125 and special transport conditions and any special legal requirements should also be
1126 included on the label. For intermediates or APIs with an expiry date, the expiry date
1127 should be indicated on the label and Certificate of Analysis. For intermediates or
1128 APIs with a retest date, the retest date should be indicated on the label and/or
1129 Certificate of Analysis.
1130
- 1131 9.43 Packaging and labelling facilities should be inspected immediately before use to ensure
1132 that all materials not needed for the next packaging operation have been removed.
1133 This examination should be documented in the batch production records, the facility
1134 log, or other documentation system.
1135
- 1136 9.44 Packaged and labelled intermediates or APIs should be examined to ensure that
1137 containers and packages in the batch have the correct label. This examination may be
1138 part of the packaging operation. Results of these examinations should be recorded in
1139 the batch production or control records.
1140
- 1141 9.45 Intermediate or API containers that are transported outside of the manufacturer's
1142 control should be sealed in a manner such that, if the seal is breached or missing, the
1143 recipient will be alerted to the possibility that the contents may have been altered.
1144
1145
1146

1147 **10 Storage and Distribution**

1148

1149 **10.1 Warehousing Procedures**

1150

1151 10.10 Facilities should be available for the storage of all materials under appropriate
1152 conditions (e.g. controlled temperature and humidity when necessary). Records should
1153 be maintained of these conditions if they are critical for the maintenance of material
1154 characteristics.

1155

1156 10.11 Unless there is an alternative system to prevent the unintentional or unauthorised use
1157 of quarantined, rejected, returned, or recalled materials, separate storage areas should
1158 be assigned for their temporary storage until the decision as to their future use has
1159 been taken.

1160

1161 **10.2 Distribution Procedures**

1162

1163 10.20 APIs should only be released for distribution to third parties after they have been
1164 released by the quality unit(s). API's may be transferred under quarantine to another
1165 unit under the company's control when authorized by the quality unit(s) and providing
1166 appropriate controls and documentation are in place.

1167

1168 10.21 APIs should be transported in a manner that does not adversely affect their quality.

1169

1170 10.22 Special transport or storage conditions for an API should be stated on the label.

1171

1172 10.23 The API manufacturer should ensure that the contract acceptor (contractor) for
1173 transportation of the API knows and follows the appropriate transport and storage
1174 conditions.

1175

1176 10.24 A system should be in place by which the distribution of each batch of intermediate
1177 and/or API can be readily determined to permit its recall if necessary.

1178

1179

1180

1181 **11 Laboratory Controls**

1182

1183 **11.1 General Controls**

1184

1185 11.10 The independent quality unit(s) must have at its disposal adequate laboratory facilities.

1186

1187 11.11 There should be documented procedures describing sampling, testing, approval or
1188 rejection of materials, and recording and storage of laboratory data.

1189

1190 11.12 Laboratory records should be maintained in accordance with Section 6.6.

1191

1192 11.13 All specifications, sampling plans, and test procedures should be scientifically sound
1193 and appropriate to ensure that raw materials, intermediates, APIs, and labels and
1194 packaging materials conform to established standards of quality and/or purity.
1195 Specifications and test procedures should be consistent with those included in the
1196 registration/filing. There may be specifications in addition to those in the
1197 registration/filing. All specifications, sampling plans, and test procedures, including
1198 changes to them, should be drafted by the appropriate organizational unit and reviewed
1199 and approved by the quality unit(s).

1200

- 1201 11.14 Appropriate specifications should be established for APIs in accordance with
1202 accepted standards and consistent with the manufacturing process. The specifications
1203 should include a control of the impurities e.g. organic impurities, inorganic impurities,
1204 and residual solvents). If the API needs to be of a specified microbiological purity,
1205 appropriate action limits for total microbial counts, objectionable organisms, and
1206 endotoxins may need to be established and met.
1207
- 1208 11.15 Laboratory controls should be followed and documented at the time of performance.
1209 Any deviation from the above described procedures should be documented and
1210 justified.
1211
- 1212 11.16 Any out-of-specification result obtained should be investigated and documented
1213 according to a procedure. This procedure should require analysis of the data,
1214 assessment of whether a significant problem exists, allocation of the tasks for
1215 corrective actions and conclusions. Any resampling and/or retesting after OOS
1216 results should be performed according to a documented procedure.
1217
- 1218 11.17 Primary standards should be obtained as appropriate for the manufacture of APIs.
1219 The source of each primary standard should be documented. Records should be
1220 maintained of each primary standards storage and use in accordance with the
1221 supplier's recommendations. Primary reference standards obtained from an officially
1222 recognised source need not be tested if stored under conditions consistent with the
1223 supplier's recommendations.
1224
- 1225 11.18 In cases where a primary standard is necessary and one is not available from an
1226 officially recognized source, an "in-house primary standard" should be established.
1227 This standard may be prepared by independent synthesis or by further purification of
1228 existing production material. Appropriate testing should be performed to establish fully
1229 the identity and purity. Appropriate documentation of this testing should be
1230 maintained.
1231
- 1232 11.19 Secondary laboratory reference standards should be appropriately prepared, identified,
1233 tested, approved, and stored. The suitability of each batch of secondary reference
1234 standard should be determined prior to first use by comparing against a primary
1235 reference standard. Each batch of secondary reference standard should be
1236 periodically requalified in accordance with a written protocol.
1237
1238
- 1239 **11.2 Testing of Intermediates and APIs**
1240
- 1241 11.20 For each batch of intermediate and API, appropriate laboratory tests should be
1242 conducted to determine conformance to specifications.
1243
- 1244 11.21 An impurity profile describing the identified and unidentified impurities present in a
1245 typical batch produced by a specific controlled production process should normally be
1246 established for each API. The impurity profile includes the identity or some qualitative
1247 analytical designation (e.g. retention time), the range of each impurity observed, and
1248 classification of each identified impurity (e.g. inorganic, organic, solvent). The
1249 impurity profile is normally dependent upon the process and origin of the API.
1250 Impurity profiles are normally not necessary for APIs from herbal or animal tissue
1251 origin. Biotech considerations are covered in ICH Guideline Q6B.

- 1252
1253 11.22 The impurity profile should be compared at appropriate intervals against the impurity
1254 profile in the regulatory submission or compared against historical data in order to
1255 detect changes to the API resulting from modifications in raw materials, equipment
1256 operating parameters, or the production process.
1257
- 1258 11.23 Appropriate microbiological tests should be conducted on each batch of intermediate
1259 and API where a defined microbial quality is necessary.
1260
- 1261
- 1262 **11.3 Validation of Analytical Procedures** - see Section 12.
1263
1264
- 1265 **11.4 Certificates of Analysis**
1266
- 1267 11.40 Authentic Certificates of Analysis should be issued for each batch of intermediate or
1268 API on request.
1269
- 1270 11.41 Information on the name of the intermediate or API including its grade, where
1271 appropriate, the batch number, the date of release, and the expiry date should be
1272 provided on the label and Certificate of Analysis. For intermediates or APIs with a
1273 retest date, the retest date should be indicated on the label and/or Certificate of
1274 Analysis.
1275
- 1276 11.42 The Certificate should list each test performed in accordance with compendial or
1277 customer requirements, including the acceptance limits, and the numerical results
1278 obtained (if test results are numerical).
1279
- 1280 11.43 Certificates should be dated and signed by authorised personnel of the quality unit(s)
1281 and should show the name, address and telephone number of the original
1282 manufacturer. In case the analysis has been carried out by a repacker or reprocessor,
1283 the Certificate of Analysis should show the name, address and telephone number of
1284 the repacker/reprocessor and a reference to the name of the original manufacturer.
1285
- 1286 11.44 If new Certificates are issued by or on behalf of repackers/reprocessors, agents or
1287 brokers, these Certificates should show the name, address and telephone number of
1288 the laboratory that performed the analysis. They should also contain a reference to the
1289 name and address of the original manufacturer and to the original batch Certificate, a
1290 copy of which should be attached.
1291
1292
- 1293 **11.5 Stability Monitoring of APIs**
1294
- 1295 11.50 A documented, on-going, testing program should be designed to monitor the stability
1296 characteristics of APIs, and the results should be used to confirm appropriate storage
1297 conditions and retest or expiry dates. Where appropriate, these programs should be
1298 consistent with the ICH guidelines on stability.
1299
- 1300 11.51 The test procedures used in stability testing should be validated and be stability
1301 indicating.
1302

11.52 Stability samples should be stored in containers that simulate the market container. For example, if the API is marketed in bags within fiber drums, stability samples may be packaged in bags of the same material and in smaller-scale drums of similar or identical material composition to the market drums.

11.53 Normally the first three commercial production batches should be placed on the stability monitoring program to confirm the retest or expiry date. However, where data from previous studies shows that the API is expected to remain stable for at least two years, fewer than three batches may be used.

11.54 Thereafter, at least one batch per year of API manufactured (unless none is produced that year) should be added to the stability monitoring program and tested at least annually to confirm the stability.

11.55 For APIs with short shelf-lives, testing should be done more frequently. For example, for those biotechnological/biologic and other APIs with shelf-lives of one year or less, stability samples should be obtained and should be tested monthly for the first three months, and at three month intervals after that. When data exist that confirm that the stability of the API is not compromised, elimination of specific test intervals (e.g. 9 month testing) may be considered.

11.6 Expiry and Retest Dating

11.60 When an intermediate is intended to be transferred outside the control of the manufacturer's material management system and an expiry or retest date is assigned, supporting stability information should be available (e.g. published data, test results).

11.61 An API expiry or retest date should be based on an evaluation of data derived from stability studies. Common practice is to use a retest date, not an expiration date.

11.62 Preliminary API expiry or retest dates may be based on pilot scale batches if (1) the pilot batches employ a method of manufacture and procedure that simulates the final process to be used on a commercial manufacturing scale; and (2) the quality of the API represents the material to be made on a commercial scale.

11.63 A representative sample should be taken for the purpose of performing a retest.

11.7 Reserve/Retention Samples

11.70 Reserve samples are maintained for the purpose of evaluating the quality of batches of API at a later date, if necessary. The packaging and holding of these samples is for the purpose of potential future evaluation and not for future stability testing purposes.

11.71 Appropriately identified reserve samples of each API batch should be retained for one year after the expiry date of the batch assigned by the manufacturer, or for three years after distribution of the batch, whichever is the longer. For APIs with retest dates, similar reserve samples should be retained for three years after the batch is completely distributed from the manufacturer.

- 11.72 The reserve sample should be stored under conditions consistent with product labels, in the same packaging system in which the API is stored or in one that is equivalent to or more protective than the marketed packaging system. Sufficient quantities should be retained to conduct at least two full compendial analyses or, when there is no pharmacopeial monograph, two full specification analyses.

12 Validation

12.1 Validation Policy

- 12.10 The company's overall policy, intentions, and approach to validation, including the validation of production processes, cleaning procedures, analytical methods, in-process control test procedures, computerized systems, and persons responsible for design, review, approval and documentation of each validation phase, should be documented.
- 12.11 The critical parameters/attributes should normally be identified during the development stage or from historical data, and the ranges necessary for the reproducible operation should be defined. This should include:
- Defining the API in terms of its critical product attributes;
 - Identifying process parameters that may affect the critical quality attributes of the API;
 - Determining the range for each critical process parameter expected to be used during routine manufacturing and process control.
- 12.12 Validation should extend to those operations determined to be critical to the quality and purity of the API.

12.2 Validation Documentation

- 12.20 A written validation protocol should be established that specifies how validation of a particular process will be conducted. The protocol should be reviewed and approved by the quality unit(s) and other designated units.
- 12.21 The validation protocol should specify critical process steps and acceptance criteria as well as the type of validation to be conducted (e.g. retrospective, prospective, concurrent) and the number of process runs.
- 12.22 A validation report that cross-references the validation protocol should be prepared, summarising the results obtained, commenting on any deviations observed, and drawing the necessary conclusions, including recommending changes necessary to correct deficiencies.
- 12.23 Any changes to the plan as defined in the validation protocol should be documented with appropriate justification.

12.3 Qualification

12.30 Before starting process validation activities, appropriate qualification of equipment and ancillary systems should be completed. Qualification is usually carried out by conducting the following activities, individually or combined:

- Design Qualification (DQ) is documented verification that the proposed design of the facilities, equipment, or systems is suitable for the intended purpose.
- Installation Qualification (IQ) is documented verification that the equipment or systems, as installed or modified, comply with the approved design and the manufacturer's recommendations.
- Operational Qualification (OQ) is documented verification that the equipment or systems, as installed or modified, perform as intended throughout the anticipated operating ranges.
- Performance Qualification (PQ) is documented verification that the equipment and ancillary systems, as connected together, can perform effectively and reproducibly based on the approved process method and specifications.

12.4 Approaches to Process Validation

12.40 Process Validation (PV) is the documented evidence that the process, operated within established parameters, can perform effectively and reproducibly to produce an intermediate or API meeting its predetermined specifications and quality attributes.

12.41 There are three approaches to validation. Prospective validation is the preferred approach, but there are exceptions where the other approaches may be used. These approaches and their applicability are listed below.

12.42 Prospective validation should normally be performed for all API processes as defined in 12.12. Results of prospective validation when performed on an API process must be completed at the latest before the commercial distribution of the final drug product manufactured from that API.

12.43 Concurrent validation may be conducted when data from replicate production runs are unavailable because only a limited number of API batches have been produced, API batches are produced infrequently, or API batches are produced by a validated process that has been modified. Prior to the completion of concurrent validation, batches may be released and used in final drug product for commercial distribution based on thorough monitoring and testing of the API batches.

12.44 An exception may be made for retrospective validation for well established processes that have been used without significant changes to API quality due to changes in raw materials, equipment, systems, facilities, or the production process. This validation approach may be used where:

- (1) Critical quality attributes and critical process parameters have been identified;

- (2) Appropriate in-process acceptance criteria and controls have been established;
(3) There have not been significant process/product failures attributable to causes other than operator error or equipment failures unrelated to equipment suitability; and
(4) Impurity profiles have been established for the existing API.

12.45 Batches selected for retrospective validation should be representative of all batches made during the review period, including any batches that failed to meet specifications, and should be sufficient in number to demonstrate process consistency. Additional testing of retained samples may be needed to obtain the necessary amount or type of data to retrospectively validate the process.

12.5 Process Validation Program

12.50 The number of process runs needed for validation should depend on the complexity of the process or the magnitude of the process change being considered. For prospective and concurrent validation, three consecutive successful production batches should be used as a guide, but there may be situations where additional process runs are warranted to prove consistency of the process (e.g., complex API processes or API processes with prolonged completion times). For retrospective validation, generally data from ten to thirty consecutive batches should be examined to assess process consistency, but fewer batches may be examined if justified.

12.51 Critical process parameters should be controlled and monitored during process validation studies. Process parameters unrelated to quality, such as variables controlled to minimize energy consumption or equipment use, need not be included in the process validation.

12.52 Process validation should confirm that the impurity profile for each API is within the limits specified. The impurity profile should be comparable to or better than historical data and, where applicable, the profile determined during process development or for batches used for pivotal clinical and toxicological studies.

12.6 Periodic Review of Validated Systems

12.60 Systems and processes should be periodically evaluated to verify that they are still operating in a valid manner. Where no significant changes have been made to the system or process, a quality review with evidence that the system or process is consistently producing product meeting its specifications fulfils the need for revalidation.

12.7 Cleaning Validation

12.70 Cleaning procedures should normally be validated. In general, cleaning validation should be directed to situations or process steps where contamination or incidental carryover of materials pose the greatest risk to API quality. For example, in early production it may be unnecessary to validate equipment cleaning procedures where residues are removed by subsequent purification steps.

- 1507
1508 12.71 Validation of cleaning procedures should reflect actual equipment usage patterns. If
1509 various APIs or intermediates are manufactured in the same equipment and the
1510 equipment is cleaned by the same process, a representative intermediate or API may
1511 be selected for cleaning validation. This selection may be based on the solubility and
1512 difficulty of cleaning and the calculation of residue limits based on potency, toxicity,
1513 and stability.
1514
- 1515 12.72 The cleaning validation protocol should describe the equipment to be cleaned,
1516 procedures, materials, acceptable cleaning levels, parameters to be monitored and
1517 controlled, and analytical methods. The protocol should also indicate the type of
1518 samples to be obtained and how they are collected and labelled.
1519
- 1520 12.73 Sampling should include swabbing, rinsing, or alternative methods (e.g., direct
1521 extraction), as appropriate, to detect both insoluble and soluble residues. The sampling
1522 methods used should be capable of quantitatively measuring levels of residues
1523 remaining on the equipment surfaces after cleaning. Swab sampling may be
1524 impractical when product contact surfaces are not easily accessible due to equipment
1525 design and/or process limitations (e.g., inner surfaces of hoses, transfer pipes, reactor
1526 tanks with small ports or handling toxic materials, and small intricate equipment such
1527 as micronizers and microfluidizers).
1528
- 1529 12.74 Validated analytical methods having sensitivity to detect residues or contaminants
1530 should be used. The detection limit for each analytical method should be sufficiently
1531 sensitive to detect the established acceptable level of the residue or contaminant. The
1532 method's attainable recovery level should be established. Residue limits should be
1533 practical, achievable, verifiable and based on the most deleterious residue. Limits may
1534 be established based on the minimum known pharmacological, toxicological, or
1535 physiological activity of the API or its most deleterious component.
1536
- 1537 12.75 Equipment cleaning/sanitization studies should address microbiological and endotoxin
1538 contamination for those processes where there is a need to reduce total
1539 microbiological count or endotoxins in the API, or other processes where such
1540 contamination may be of concern (e.g., non-sterile APIs used to manufacture sterile
1541 products).
1542
- 1543 12.76 Cleaning procedures should be monitored at appropriate intervals after validation to
1544 ensure that these procedures are effective when used during routine production.
1545 Equipment cleanliness may be monitored by analytical testing and visual examination,
1546 where feasible. Visual inspection may allow detection of gross contamination
1547 concentrated in small areas that could go undetected by sampling and/or analysis.
1548
1549

1550 **12.8 Validation of Analytical Methods**

- 1551
1552 12.80 Analytical methods should be validated unless the method employed is included in the
1553 current edition of an official pharmacopoeia or other recognised standard references.
1554 The suitability of all testing methods used should nonetheless be verified under actual
1555 conditions of use and documented.
1556

1557 12.81 Methods should be validated to include consideration of characteristics included within
1558 the ICH guidelines on validation of analytical methods. The degree of analytical
1559 validation performed should reflect the purpose of the analysis and the stage of the
1560 API process.

1561
1562 12.82 Appropriate qualification of analytical equipment should be considered before starting
1563 validation of analytical methods.

1564
1565 12.83 Complete records should be maintained of any modification of a validated analytical
1566 method. Such records should include the reason for the modification and appropriate
1567 data to verify that the modification produces results that are as accurate and reliable
1568 as the established method.

1571 **13 Change Control**

1572
1573 13.10 A formal change control system should be established to evaluate all changes that
1574 may affect the production and control of the intermediate or API .

1575
1576 13.11 Written procedures should provide for the identification, documentation, appropriate
1577 review, and approval of changes in raw materials, specifications, analytical methods,
1578 facilities, support systems, equipment (including computer hardware), processing steps,
1579 labelling and packaging materials, and computer software.

1580
1581 13.12 Any proposals for GMP relevant changes should be drafted, reviewed, and approved
1582 by the appropriate organisational units, and reviewed and approved by the quality
1583 unit(s).

1584
1585 13.13 The potential impact of the proposed change on the quality of the intermediate or API
1586 should be evaluated. A classification procedure may help in determining the level of
1587 testing, validation, and documentation needed to justify changes to a validated process.
1588 Changes may be classified (e.g. as minor or major) depending on the nature and
1589 extent of the changes, and the effects these changes may impart on to the process.
1590 Scientific judgement should determine what additional testing and validation studies are
1591 needed to justify a change in a validated process.

1592
1593 13.14 When implementing approved changes, measures should be taken to ensure that all
1594 documents affected by the changes are revised.

1595
1596 13.15 After the change has been implemented, there should be an evaluation of the first
1597 batches produced or tested under the change.

1598
1599 13.16 The potential effects of critical process changes upon established retest or expiry
1600 dates should be evaluated. If necessary, samples of the intermediate or API produced
1601 by the modified process may be placed on an accelerated stability program and/or
1602 may be added to the stability monitoring program.

1603
1604 13.17 Current dosage form manufacturers should be notified of changes from established
1605 production and process control procedures which can impact the quality of the API.

1606
1607

14 Rejection and Re-Use of Materials

14.1 Rejection

14.10 Intermediates and APIs failing to meet established specifications should be identified as such and quarantined. These intermediates or APIs can be reprocessed or reworked as described below. The final disposition of rejected materials should be recorded.

14.2 Reprocessing

14.20 Introducing an intermediate or API, including one which does not conform to standards or specifications, back into the process and reprocessing by repeating a crystallization step or other appropriate chemical or physical manipulation steps (e.g., distillation, filtration, chromatography, milling) that are part of the established manufacturing process is generally acceptable. However, if such reprocessing is used for a majority of batches, such reprocessing should be included as part of the standard manufacturing process.

14.21 Continuation of a chemical reaction after an in-process control test shows the reaction to be incomplete is considered to be part of the normal process. This is not considered to be reprocessing.

14.22 Introducing unreacted material back into a process and repeating a chemical reaction is considered to be reprocessing unless it is part of the established process. Such reprocessing should be preceded by careful evaluation to ensure that the quality of the intermediate or API is not adversely impacted due to the potential formation of by-products and over reacted materials.

14.3 Reworking

14.30 Before a decision is taken to rework batches that do not conform to established standards or specifications, an investigation into the reason for non-conformance should be performed.

14.31 Batches that have been reworked should be subjected to appropriate evaluation, testing, stability testing if warranted, and documentation to show that the reworked product is of equivalent quality to that produced by the original process. Concurrent validation is often the appropriate validation approach for rework procedures. This allows a protocol to define the rework procedure, how it will be carried out, and the expected results. If there is only one batch to be reworked, then an interim report can be written and the batch released once it is found to be acceptable.

14.32 Procedures should provide for comparing the impurity profile of each reworked batch against batches manufactured by the established process. Where routine analytical methods are inadequate to characterize the reworked batch, additional methods should be used.

14.4 Recovery of Materials and Solvents

14.40 Recovery (e.g. from mother liquor or filtrates) of reactants, intermediates, or the API is acceptable, provided that approved procedures exist for the recovery and that the recovered materials meet specifications suitable for their intended use.

14.41 Solvents may be recovered and reused in the same processes or in different processes, provided that the recovery procedures are controlled and monitored to ensure that solvents meet appropriate standards before reuse or co-mingling with other approved materials.

14.42 Fresh and recovered solvents and reagents may be combined if adequate testing has shown their suitability for all manufacturing processes in which they may be used.

14.43 The use of recovered solvents, mother liquors, and other recovered materials should be adequately documented.

14.5 Returns

14.50 Returned intermediates or APIs should be identified as such and quarantined.

14.51 If the conditions under which returned intermediates or APIs have been stored or shipped before or during their return or the condition of their containers casts doubt on their quality, the returned intermediates or APIs should be reprocessed, reworked, or destroyed, as appropriate.

14.52 Records of returned intermediates or APIs should be maintained. For each return, documentation should include:

- Name and address of the consignee
- Intermediate or API, batch number, and quantity returned
- Reason for return
- Use or disposal of the returned intermediate or API

15 Complaints and Recalls

15.10 All quality related complaints, whether received orally or in writing, should be recorded and investigated according to a written procedure.

15.11 Complaint records should include:

- Name and address of complainant;
- Name (and, where appropriate, title) and phone number of person submitting the complaint;
- Complaint nature (including name and batch number of the API);
- Date complaint is received;
- Action initially taken (including dates and identity of person taking the action);
- Follow-up action taken (if necessary);
- Response provided to the originator of complaint (including date response sent); and
- Final decision on intermediate or API batch or lot.

1710 15.12 Records of complaints should be retained in order to evaluate trends, product-related
1711 frequencies, and severity with a view to taking additional, and if necessary, immediate
1712 corrective action.
1713

1714 15.13 There should be a written procedure that defines the circumstances under which a
1715 recall of an intermediate or API should be considered.
1716

1717 15.14 The recall procedure should designate who should be involved in evaluating the
1718 information, how a recall should be initiated, who should be informed about the recall,
1719 and how the recalled material should be treated.
1720

1721 15.15 In the event of a serious or potentially life-threatening situation, local, national, and/or
1722 international authorities should be informed and their advice sought.
1723
1724

1725 **16 Contract Manufacturers (including Laboratories)**

1726

1727 16.10 All contract manufacturers (including laboratories) should comply with the GMP
1728 defined in this Guide. Special consideration should be given to the prevention of cross-
1729 contamination and to maintaining traceability.
1730

1731 16.11 Contract manufacturers (including laboratories) should be evaluated by the contract
1732 giver to ensure GMP compliance of the specific operations occurring at the contract
1733 sites.
1734

1735 16.12 There should be a written and approved contract or formal agreement between the
1736 contract giver and the contract acceptor that defines in detail the GMP responsibilities,
1737 including the quality measures, of each party.
1738

1739 16.13 The contract should permit the contract giver to audit the contract acceptor's facilities
1740 for compliance with GMP.
1741

1742 16.14 Where subcontracting is allowed, the contract acceptor should not pass to a third party
1743 any of the work entrusted to him under the contract without the contract giver's prior
1744 evaluation and approval of the arrangements.
1745

1746 16.15 Manufacturing and analytical records should be kept at the site where the activity
1747 occurs and be readily available.
1748

1749 16.16 Changes in the process, equipment, test methods, specifications, or other contractual
1750 requirements should not be made unless the contract giver is informed and approves
1751 the changes.
1752
1753
1754

1755 **17 Agents, Brokers, Distributors, Repackers, and Relabellers**

1756

1757 **17.1 Applicability**

1758

1759 17.10 Throughout Section 17 the term API refers to both API and intermediate.
1760

1761 17.11 This section applies to any party other than the original manufacturer who may trade
1762 and/or take possession, handle, repack, relabel, manipulate, or store an API.

1763
1764 17.12 All agents, brokers, distributors, repackers, and relabellers should comply with GMP
1765 as defined in this Guide.

1766 1767 1768 **17.2 Traceability of Distributed APIs**

1769
1770 17.20 Agents, brokers, distributors, repackers, or relabellers should maintain complete
1771 traceability of APIs that they distribute. Documents that should be retained and
1772 available include:

- 1773
- 1774 - Identity of original manufacturer
- 1775 - Address of original manufacturer
- 1776 - Purchase orders
- 1777 - Bills of lading (transportation documentation)
- 1778 - Receipt documents
- 1779 - Name or designation of API
- 1780 - Manufacturer's batch number
- 1781 - Transportation and distribution records
- 1782 - All authentic Certificates of Analysis including those of the original manufacturer
- 1783 - Retest or expiry date
- 1784

1785 1786 **17.3 Quality Management**

1787
1788 17.30 Agents, brokers, distributors, repackers, or relabellers should establish, document and
1789 implement an effective system of managing quality as specified in Section 2.

1790 1791 1792 **17.4 Repackaging, Relabelling and Holding of APIs**

1793
1794 17.40 Repackaging, relabelling and holding of APIs should be performed under appropriate
1795 GMP controls, as stipulated in this Guide, to avoid mix-ups and loss of API identity or
1796 purity.

1797
1798 17.41 Repackaging should be conducted under appropriate environmental conditions to avoid
1799 contamination and cross-contamination.

1800 1801 1802 **17.5 Stability**

1803
1804 17.50 Stability studies to justify assigned expiration or retest dates should be conducted if the
1805 API is repackaged in a different type of container than that used by the API
1806 manufacturer.

1807 1808 1809 **17.6 Transfer of Information**

- 1811 17.60 Agents, brokers, distributors, repackers, or relabellers should transfer all quality or
1812 regulatory information received from an API manufacturer to the customer, and from
1813 the customer to the API manufacturer.
1814
- 1815 17.61 The agent, broker, distributor, repacker, or relabeller who supplies the API to the
1816 customer should provide the name of the original API manufacturer and the batch
1817 number(s) supplied.
1818
- 1819 17.62 The agent should also provide the identity of the original API manufacturer to
1820 regulatory authorities upon request. The original manufacturer may respond to the
1821 regulatory authority directly or through its authorized agents depending on the legal
1822 relationship between the authorized agents and the original API manufacturer. (In this
1823 context "authorized" refers to authorized by the manufacturer.)
1824
- 1825 17.63 The specific guidance for Certificates of Analysis included in Section 11.4 should be
1826 met.
1827
1828
- 1829 **17.7 Handling of Complaints and Recalls**
1830
- 1831 17.70 Agents, brokers, distributors, repackers, or relabellers should maintain records of
1832 complaints and recalls, as specified in Section 15, for all complaints and recalls that
1833 come to their attention.
1834
- 1835 17.71 If the situation warrants, the agents, brokers, distributors, repackers, or relabellers
1836 should review the complaint with the original API manufacturer in order to determine
1837 whether any further action, either with other customers who may have received this
1838 API or with the regulatory authority, or both, should be initiated. The investigation into
1839 the cause for the complaint or recall should be conducted and documented by the
1840 appropriate party.
1841
- 1842 17.72 Where a complaint is referred to the original API manufacturer, the record maintained
1843 by the agents, brokers, distributors, repackers, or relabellers should include any
1844 response received from the original API manufacturer (including date and information
1845 provided).
1846
1847
- 1848 **17.8 Handling of Returns**
1849
- 1850 17.80 Returns should be handled as specified in Section 14.52. The agents, brokers,
1851 distributors, repackers, or relabellers should maintain documentation for returned
1852 APIs.
1853
- 1854 **19**
- 1855 **18. Specific Guidance for APIs Manufactured by Cell**
1856 **Culture/Fermentation**
1857
- 1858 **18.1 General**
1859
- 1860 18.10 Section 18 is intended to address specific controls for APIs or intermediates
1861 manufactured by cell culture or fermentation using natural or recombinant organisms

which have not been covered adequately in the previous sections. It is not intended to be a stand alone Section. In general, the GMP principles in the other sections of this document apply. Note that the principles of fermentation for “classical” processes for production of small molecules and for processes using recombinant and non-recombinant organisms for production of proteins and/or polypeptides are the same, although the degree of control will vary. Where practical this section will address these differences. In general, the degree of control for biotech processes is greater than that for classical fermentation processes.

18.11 Production of APIs or intermediates from cell culture or fermentation involves biological processes such as cultivation of cells or extraction and purification of material from living organisms. Note that there may be additional process steps, such as physicochemical modification, that are part of the manufacturing process. The raw materials (media, buffer components) used may provide good substrates for microbiological contaminants. Depending on the source, method of preparation, and the intended use of the API or intermediate, control of bioburden, viral contamination, and/or endotoxins during manufacturing and monitoring of the process at appropriate stages may be necessary.

18.12 Appropriate controls need to be in place at all stages of manufacturing to preserve intermediate and/or API quality. While this Guide starts at the cell culture/fermentation step, prior steps (e.g. cell banking) should be performed under appropriate process controls. This Guide covers cell culture/fermentation from the point at which a vial of the cell bank is retrieved for use in manufacturing.

18.13 Appropriate equipment and environmental controls should be used to minimize contamination. The acceptance criteria for quality of the environment and the frequency of monitoring depend on the step in production and the production conditions (open, closed, or contained systems).

18.14 In general, process controls should take into account:

- Maintenance of the Working Cell Bank;
- Proper inoculation and expansion of the culture;
- Control of the critical operating parameters during fermentation/cell culture;
- Monitoring of the process for cell growth, viability (for biotech processes) and productivity;
- Harvest and purification procedures that remove cells, cellular debris and media components while protecting the intermediate or API from contamination, particularly of a microbiological nature and loss of intermediate or API quality;
- Bioburden and endotoxin levels should be monitored at appropriate stages of production; and
- For biotech products, viral safety concerns should be as described in ICH Guideline Q5A *Quality of Biotechnological Products: Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of Human or Animal Origin*.

18.15 For biotech products, validation of the removal of media components, host cell proteins, other process-related impurities, product related impurities and contaminants may be necessary.

18.2 Cell Bank Maintenance and Record Keeping

- 1913
- 1914 18.20 Access to cell banks should be limited to authorized personnel.
- 1915
- 1916 18.21 Cell banks should be maintained under storage conditions designed to maintain viability
- 1917 and prevent contamination
- 1918
- 1919 18.22 Records of the use of the vials from the cell banks and storage conditions should be
- 1920 maintained
- 1921
- 1922 18.23 Cell banks should be periodically monitored to determine suitability for use. For
- 1923 classical fermentation the usage period of the cell strain is usually defined.
- 1924
- 1925 18.24 See ICH Guideline Q5D *Quality of Biotechnological Products: Derivation and*
- 1926 *Characterization of Cell Substrates Used for Production of*
- 1927 *Biotechnological/Biological Products* for a more complete discussion of cell
- 1928 banking.
- 1929
- 1930
- 1931 **18.3 Cell Culture/Fermentation**
- 1932
- 1933 18.30 Where possible, closed or contained systems should be used to permit the aseptic
- 1934 addition of cell substrates, media, buffers and gases. If the inoculation of the initial
- 1935 vessel or subsequent transfers or additions (media, buffers) are performed in open
- 1936 vessels, there should be controls and procedures in place to minimize contamination.
- 1937
- 1938 18.31 For biotech processes, manipulations using open vessels should be performed in a
- 1939 biosafety cabinet or similarly controlled environment to prevent contamination.
- 1940
- 1941 18.32 Personnel should be appropriately gowned and take special precautions handling the
- 1942 cultures.
- 1943
- 1944 18.33 Critical operating parameters, for example temperature, pH, agitation rates, addition of
- 1945 gases, pressure, should be monitored to ensure consistency with the established
- 1946 process. Cell growth, viability (for biotech processes), and productivity should also be
- 1947 monitored. Critical parameters will vary from one process to another, and for
- 1948 classical fermentation certain parameters (cell viability, for example) may not need to
- 1949 be monitored.
- 1950
- 1951 18.34 Cell culture and fermentation equipment should be cleaned and sterilized after use
- 1952 when used in the manufacture of biotech products. Fermentation equipment for the
- 1953 “classical fermentation” processes should be cleaned and sanitized as appropriate.
- 1954
- 1955 18.35 Culture media should be sterilized before use when necessary to protect the quality of
- 1956 the API.
- 1957
- 1958 18.36 There should be appropriate procedures in place to detect contamination and
- 1959 determine the course of action to be taken. This should include procedures to
- 1960 determine the impact of the contamination on the product and those to decontaminate
- 1961 the equipment and return them to a condition to be used in subsequent batches.
- 1962 Foreign organisms observed during fermentation processes should be identified as
- 1963 appropriate and the effect of their presence on product quality should be assessed if

- 1964 necessary. The results of such assessments should be taken into consideration in the
1965 disposition of the material produced.
1966
- 1967 18.37 Records of contamination events should be maintained.
1968
- 1969 18.38 Shared equipment (multi-product) may require additional cleaning or testing between
1970 product campaigns, as appropriate, to minimize cross-contamination of previous
1971 activities into subsequent activities.
1972
- 1973 **18.4 Harvesting, Isolation and Purification**
1974
- 1975 18.40 Harvesting steps, whether to remove cells from the supernatant (media) or the
1976 collection of cellular components after disruption, should be done in equipment and
1977 areas designed to minimize contamination, particularly of a microbiological nature.
1978
- 1979 18.41 Harvest and purification procedures that remove or inactivate the producing organism,
1980 cellular debris and media components while minimizing degradation, contamination,
1981 and loss of quality, should be adequate to ensure that the intermediate or API is
1982 recovered with consistent quality.
1983
- 1984 18.42 All equipment should be properly cleaned/sanitized after use. Multiple successive
1985 batching without cleaning may be utilized if intermediate or API quality is not
1986 compromised.
1987
- 1988 18.43 If open systems are used, purification may need to be done under controlled
1989 environmental conditions appropriate for the preservation of product quality. For
1990 biotech products this is normally achieved in areas using HEPA filtered air.
1991
- 1992 18.44 Additional purification controls, such as dedicated chromatography resins or additional
1993 testing, may be necessary if equipment is to be used for multiple products.
1994
- 1995
- 1996 **18.5 Viral removal /inactivation steps (biotech products only)**
1997
- 1998 18.50 See the ICH Guideline ICH Guideline Q5A *Quality of Biotechnological Products:*
1999 *Viral Safety Evaluation of Biotechnology Products Derived from Cell Lines of*
2000 *Human or Animal Origin* for more specific information.
2001
- 2002 18.51 Viral removal and viral inactivation steps are critical processing steps for some biotech
2003 processes and should be performed within their validated parameters.
2004
- 2005 18.52 Appropriate precautions should be taken to prevent potential viral contamination from
2006 pre- to post-viral removal/inactivation steps. Therefore, open processing should be
2007 performed in separate areas with separate air handling units.
2008
- 2009 18.53 Separate equipment is normally used for different purification steps. However, if the
2010 same equipment is to be used, the respective equipment should be appropriately
2011 cleaned and sanitized before reuse. Appropriate precautions should be taken to
2012 prevent potential virus carry-over (e.g. through equipment or environment) from
2013 previous steps.

2014

2015

2016 **19 APIs for Use in Clinical Trials**

2017

2018 **19.1 General**

2019

2020 19.10 Not all the controls in the previous sections of this Guide are appropriate for the
2021 manufacture of a new API for investigational use during its development. Section 19
2022 provides specific guidance unique to these circumstances.

2023

2024 19.11 The controls used in the manufacture of APIs for use in clinical trials should be
2025 consistent with the stage of development of the drug product incorporating the API.
2026 Process and test procedures should be flexible to provide for changes as knowledge of
2027 the process increases and clinical testing of a drug product progresses from pre-
2028 clinical stages through clinical stages. Once drug development reaches the stage
2029 where the API is produced for use in drug products intended for clinical trials,
2030 manufacturers should ensure that APIs are manufactured in suitable facilities using
2031 appropriate production and control procedures to ensure the quality of the API.

2032

2033

2034 **19.2 Quality**

2035

2036 19.20 Appropriate GMP concepts should be applied in the production of APIs for use in
2037 clinical trials with a suitable mechanism of approval of each batch.

2038

2039 19.21 A quality unit(s) independent from production should be established for the approval or
2040 rejection of each batch of API for use in clinical trials.

2041

2042 19.22 Some of the testing functions commonly performed by the quality unit(s) may be
2043 performed within other areas.

2044

2045 19.23 Quality measures should include a system for testing of raw materials, packaging
2046 materials, intermediates, and APIs.

2047

2048 19.24 Process and quality problems should be evaluated.

2049

2050 19.25 Labelling for APIs intended for use in clinical trials should be appropriately controlled
2051 and identified as being for investigational use.

2052

2053

2054 **19.3 Equipment and Facilities**

2055

2056 19.30 During all phases of clinical development, including the use of small scale facilities or
2057 laboratories to manufacture batches of APIs for use in clinical trials, procedures
2058 should be in place to ensure that equipment is calibrated, clean and suitable for its
2059 intended use.

2060

2061 19.31 Procedures for the use of facilities should ensure that materials are handled in a
2062 manner that minimizes the risk of contamination and cross-contamination.

2063

2064

19.4 Control of Raw Materials

19.40 Raw materials used in production of APIs for use in clinical trials should be evaluated by testing, or received with a supplier's analysis and subjected to identity testing. When a material is considered hazardous, a supplier's analysis should suffice.

19.41 In some instances, the suitability of a raw material may be determined before use based on acceptability in small-scale reactions (i.e., use testing) rather than on analytical testing alone.

19.5 Production

19.50 The production of APIs for use in clinical trials should be documented in laboratory notebooks, batch records, or other appropriate means. These documents should include information on the use of production materials, equipment, processing, and scientific observations.

19.51 Expected yields may be more variable and less defined than the expected yields used in commercial processes. Investigations into yield variations are not expected.

19.6 Validation

19.60 Process validation may be inappropriate during clinical API production where a single API batch may be produced or where process changes during development make batch replication difficult or inexact. The combination of controls, calibration, and, where appropriate, equipment qualification provides the assurance during this development phase.

19.61 Process validation should be conducted in accordance with Section 12 when batches are produced for commercial use, even when such batches are produced on a pilot or small scale.

19.7 Changes

19.70 Although changes are expected during clinical development, as knowledge is gained and the production is scaled up, every change in the production, specifications, or test procedures should be adequately recorded.

19.8 Laboratory Controls

19.80 All analyses performed to evaluate a batch of API for clinical trials should be scientifically sound; these methods may not yet be fully validated.

19.81 A system for retaining reserve samples of all batches should be in place. This system should ensure that a sufficient quantity of each reserve sample is retained for an appropriate length of time after approval, termination, or discontinuation of an application.

- 2116
2117 19.82 Expiry and retest dating as defined in Section 11.6 applies to existing APIs used in
2118 clinical trials. For new APIs, Section 11.6 does not normally apply in early stages of
2119 clinical trials.
2120
2121
2122 **19.9 Documentation**
2123
2124 19.90 A system should be in place to ensure that information gained during the development
2125 and the manufacture of APIs for use in clinical trials is documented and available.
2126
2127 19.91 The development and implementation of the analytical methods used to support the
2128 release of a batch of API for use in clinical trials should be appropriately documented.
2129
2130 19.92 A system for retaining production and control records should be used. This system
2131 should ensure that records are retained for an appropriate length of time after the
2132 approval, termination, or discontinuation of an application.
2133
2134

20 Glossary

Active Pharmaceutical Ingredient (API) (*or Drug Substance*)

Any substance or mixture of substances intended to be used in the manufacture of a drug (medicinal) product and that, when used in the production of a drug, becomes an active ingredient of the drug product. Such substances are intended to furnish pharmacological activity or other direct effect in the diagnosis, cure, mitigation, treatment, or prevention of disease or to affect the structure and function of the body.

API Starting Material

A material used in the production of an API which is incorporated as a significant structural fragment into the structure of the API. An API Starting Material may be an article of commerce, a material purchased from one or more suppliers under contract or commercial agreement, or it may be produced in-house. API Starting Materials are normally of defined chemical properties and structure.

Batch (or Lot)

A specific quantity of material produced in a process or series of processes so that it is expected to be homogeneous within specified limits. In the case of continuous production, a batch may correspond to a defined fraction of the production. The batch size may be defined either by a fixed quantity or the amount produced in a fixed time interval.

Batch Number (or Lot Number)

A unique combination of numbers, letters, and/or symbols which identifies a batch (or lot) and from which the production and distribution history can be determined.

Bioburden

The level and type (e.g. objectionable or not) of micro-organisms which may be present in raw materials, API starting materials, intermediates or APIs. Bioburden should not be considered contamination unless the levels have been exceeded or defined objectionable organisms have been detected.

Calibration

The demonstration that a particular instrument or device produces results within specified limits by comparison with those produced by a reference or traceable standard over an appropriate range of measurements.

Computer System

A group of hardware components and associated software, designed and assembled to perform a specific function or group of functions.

Computerized System

A process or operation integrated with a computer system.

Contamination

The undesired introduction of impurities of a chemical or microbiological nature, or of foreign matter, into or onto a raw material, intermediate, or API during production, sampling, packaging or repackaging, storage or transport.

Contract Manufacturer

2185 A company holding an agreement requiring the performance of some aspect of API
2186 manufacturing.

2187

2188 **Critical**

2189 A process step, process condition, test requirement, or other relevant parameter or item that
2190 must be controlled within predetermined criteria to ensure that the API meets its specification.

2191

2192 **Cross-Contamination**

2193 Contamination of a material or product with another material or product.

2194

2195 **Drug (Medicinal) Product**

2196 The dosage form in the final immediate packaging intended for marketing. (Reference Q1A)

2197

2198 **Drug Substance**

2199 See Active Pharmaceutical Ingredient Expiration Date:

2200

2201 **Expiration Date : See Expiry Date**

2202 **Expiry Date (or Expiration Date)**

2203 The date placed on the container/labels of an API designating the time during which the API
2204 is expected to remain within established shelf life specifications if stored under defined
2205 conditions, and after which it should not be used.

2206

2207 **Impurity**

2208 Any component present in the intermediate or API that is not the desired entity.

2209

2210 **Impurity Profile**

2211 A description of the identified and unidentified impurities present in an API.

2212

2213 **In-Process Control (or Process Control)**

2214 Checks performed during production in order to monitor and, if necessary, to adjust the
2215 process and/or to ensure that the intermediate or API conforms to its specifications.

2216

2217 **Intermediate**

2218 A material produced during steps of the processing of an API that must undergo further
2219 molecular change or purification before it becomes an API. Intermediates may or may not be
2220 isolated.

2221

2222 **Lot**

2223 See Batch

2224

2225 **Lot Number see Batch Number**

2226 **Manufacture**

2227 All operations of receipt of materials, production, packaging, repackaging, labelling, relabelling,
2228 quality control, release, storage, and distribution of APIs and the related controls.

2229

2230 **Material**

2231 A general term used to denote raw materials (starting materials, reagents, solvents), process
2232 aids, intermediates, APIs and packaging and labelling materials.

2233

2234 **Mother Liquor**

2235 The residual liquid which remains after the crystallization or isolation processes. A mother
2236 liquor may contain unreacted materials, intermediates, levels of the API and/or impurities. It
2237 may be used for further processing.
2238

2239 **Packaging Material**

2240 Any material intended to protect an intermediate or API during storage and transport.
2241

2242 **Procedure**

2243 A documented description of the operations to be performed, the precautions to be taken and
2244 measures to be applied directly or indirectly related to the manufacture of an intermediate or
2245 API.
2246

2247 **Process Aids**

2248 Materials, excluding solvents, used as an aid in the manufacture of an intermediate or API that
2249 do not themselves participate in a chemical or biological reaction (e.g. filter aid, activated
2250 carbon, etc).
2251

2252 **Process Control**

2253 See In-Process Control
2254

2255 **Production**

2256 All operations involved in the preparation of an API, from receipt of materials, through
2257 processing and packaging, to its completion as a finished API.
2258

2259 **Qualification**

2260 Action of proving and documenting that equipment or ancillary systems are properly installed,
2261 work correctly, and actually lead to the expected results. Qualification is part of validation,
2262 but the individual qualification steps alone do not constitute process validation.
2263

2264 **Quality Assurance (QA)**

2265 The sum total of the organised arrangements made with the object of ensuring that all APIs
2266 are of the quality required for their intended use and that quality systems are maintained.
2267

2268 **Quality Control (QC)**

2269 Checking or testing that specifications are met.
2270

2271 **Quality Unit(s)**

2272 An organizational unit independent of production which fulfills both Quality Assurance and
2273 Quality Control responsibilities. This may be in the form of separate QA and QC units or a
2274 single individual (or group), depending upon the size and structure of the organization.
2275

2276 **Quarantine**

2277 The status of materials isolated physically or by other effective means pending a decision on
2278 their subsequent approval or rejection.
2279

2280 **Raw Material**

2281 A general term used to denote starting materials, reagents, and solvents intended for use in the
2282 production of intermediates or APIs.
2283

2284 **Reference Standard, Primary**

A substance that has been shown by an extensive set of analytical tests to be authentic material that should be of high purity. This standard may be obtained from an officially recognised source or may be prepared by independent synthesis or by further purification of existing production material.

Reference Standard, Secondary

A substance of established quality and purity, as shown by comparison to a primary reference standard, used as a reference standard for routine laboratory analysis.

Reprocessing

Introducing an intermediate or API, including one that does not conform to standards or specifications, back into the process and repeating a crystallization step or other appropriate chemical or physical manipulation steps (e.g., distillation, filtration, chromatography, milling) that are part of the established manufacturing process. Continuation of a chemical reaction after an in-process control test shows the reaction to be incomplete is considered to be part of the normal process, and not reprocessing.

Retest Date

The date when a material should be re-examined to ensure that it is still suitable for use.

Reworking

Subjecting an intermediate or API that does not conform to standards or specifications to one or more processing steps that are different from the established manufacturing process so that its quality may be made acceptable (e.g., recrystallizing with a different solvent).

Signature (signed)

See definition for signed

Signed (signature)

The record of the individual who performed a particular action or review. This record may be initials, full handwritten signature, personal seal, or authenticated and secure electronic signature.

Solvent

An inorganic or organic liquid used as a vehicle for the preparation of solutions or suspensions in the manufacture of an intermediate or API.

Specification

A list of tests, references to analytical procedures, and appropriate acceptance criteria that are numerical limits, ranges, or other criteria for the test described. It establishes the set of criteria to which a material should conform to be considered acceptable for its intended use. "Conformance to specification" means that the material, when tested according to the listed analytical procedures, will meet the listed acceptance criteria.

Validation

A documented program that provides a high degree of assurance that a specific process, method, or system will consistently produce a result meeting pre-determined acceptance criteria.

Validation Protocol

A written plan stating how validation will be conducted and defining acceptance criteria. For example, the protocol for a manufacturing process identifies processing equipment, critical process parameters/operating ranges, product characteristics, sampling, test data to be collected, number of validation runs, and acceptable test results.

Yield, Expected

The quantity of material or the percentage of theoretical yield anticipated at any appropriate phase of production based on previous laboratory, pilot scale, or manufacturing data.

Yield, Theoretical

The quantity that would be produced at any appropriate phase of production, based upon the quantity of material to be used, in the absence of any loss or error in actual production.

* * * * *